



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SA

271 Cadman Plaza East
Brooklyn, New York 11201

October 5, 2011

BY ECF

The Honorable John Gleeson
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Betim Kaziu,
Criminal No. 09-660 (JG)

Dear Judge Gleeson:

The government submits this letter to respectfully request additional time to respond to the defendant's motion for a judgement of acquittal pursuant to Fed. R. Crim. P. Rule 29(c). As the Court is aware, at the conclusion of trial, Your Honor set a briefing schedule for Rule 29 motions and required the defendant to file its motions by September 15, 2011 and the Government to respond by October 7, 2011. Additionally, Your Honor set a reply date for the defendant of October 14, 2011 and oral argument on November 4, 2011 at the time of sentencing. On September 30, 2011, the Court adjourned sentencing until December 9, 2011. Due to scheduling issues on the part of the undersigned, the Government advises that it needs additional time to respond to the defendant's motion. As such, the Government requests that the Court allow the Government to respond by October 31, 2011 and for the reply and argument dates to be

adjusted accordingly. Counsel for the defendant recently advised of their consent to the Government's application.

Respectfully submitted,

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cc: Clerk of Court (by ECF)
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